

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA	§	
	§	
V.	§	CASE NO. 3:21-CR-00159-N
	§	
SHAUN MARQUS ROBINSON	§	

**UNOPPOSED MOTION FOR PSYCHIATRIC AND/OR PSYCHOLOGICAL
EXAMINATION**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES, Defendant, **SHAUN MARQUS ROBINSON**, by and through his undersigned counsel and without opposition from the Government, hereby moves this Court pursuant to 18 U.S.C. 4241(a) to set a hearing to determine his mental competency, order pursuant to 18 U.S.C. 4241(b) that a psychiatric or psychological examination be conducted and that a report is filed prior to that hearing, and appoint Dr. Kristi Compton to conduct the psychiatric or psychological examination and file the report.

BRIEF IN SUPPORT

In support of undersigned counsel's motion, undersigned counsel shows this Court the following:

During undersigned counsel's interactions with Mr. Robinson, Mr. Robinson seemed very paranoid and distrusting of undersigned counsel. Undersigned counsel conversed with Mr. Robinson regarding the charges that have been brought against him and possible applications of the sentencing guidelines. Mr. Robinson appeared to have extreme difficulty understanding the charges and conceptualizing the application of the sentencing guidelines.

Undersigned counsel believes a psychiatric or psychological examination is needed to determine whether Mr. Robinson is suffering from a mental disease or defect rendering him mentally incompetent to the extent that he is unable to understand the nature and consequences of the proceedings against him or to assist properly in his defense. Undersigned counsel is not trained to evaluate Mr. Robinson for competency. To properly determine whether Mr. Robinson is competent to stand trial or enter a plea, the specialized assistance of a qualified mental health expert is necessary.

Undersigned counsel has spoken with the Government regarding her concerns about Mr. Robinson's competency and her desire to use Dr. Kristi Compton to conduct the requested evaluation. The Government is not opposed to the appointment of Dr. Compton to conduct the evaluation.

WHEREFORE, Mr. Robinson prays that this Court grant this motion and order: Mr. Robinson to submit to a competency evaluation; the appointment of the parties' agreed expert, Dr. Kristi Compton, to conduct the competency evaluation and prepare a report that complies with the requirements in 18 U.S.C. § 4247(c); the report be filed with the court under seal, with copies provided to undersigned counsel and counsel for the Government; and a hearing be set to determine Mr. Robinson's mental competency.

Respectfully submitted,

/s/ Kambira Jones Morgan

Kambira Jones Morgan, Esq.

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I certify that I conferred with AUSA Brian McKay via email and via phone. Mr. McKay indicated he is unopposed to the granting of this motion.

/s/ Kambira Jones Morgan
Kambira Jones Morgan, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion was served on Brian McKay, Assistant United States Attorney, for the Northern District of Texas, Dallas Division, and by electronic transmission on February 27, 2022.

/s/ Kambira Jones Morgan
Kambira Jones Morgan, Esq.